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13 Proposed Attorneys for
14 The Roman Catholic Archbishop of San Francisco

15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
17

18 In re:
19 THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO,
20
21 Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**DECLARATION OF PAULA F.
CARNEY IN SUPPORT OF
APPLICATION TO EMPLOY
WEINTRAUB TOBIN AS SPECIAL
LITIGATION COUNSEL UNDER
SECTION 327(e)**

[No Hearing Required]

26 I, Paula F. Carney, declare:

27 1. I am an attorney duly licensed to practice law in the State of California and since
28 2013 have been General Counsel to The Roman Catholic Archbishop of San Francisco, the Debtor

1 and Debtor in Possession herein (“RCASF” or “Debtor”). If called as a witness, I would and could
2 testify competently to the matters stated herein.

3 2. This declaration is submitted in support of the Debtor’s Application to Employ
4 Weintraub Tobin Chediak Coleman & Grodin (“Weintraub”), proposed special litigation counsel
5 (the “Application”). As General Counsel, I am one of the Debtor’s responsible individuals for
6 supervising outside counsel and monitoring and controlling legal costs.

7 3. I am informed and believe, based on communications and representations by
8 Weintraub and the Declaration of Paul Gaspari filed in support of the Application, that Weintraub’s
9 billing rates and material terms for the engagement are comparable to Weintraub’s billing rates
10 and terms for other non-bankruptcy engagements and to the billing rates and terms of other
11 comparably skilled professionals. The terms of the bankruptcy engagement are substantially
12 similar to the pre-bankruptcy engagement of Weintraub.

13 4. For the reasons set forth herein, the RCASF did not interview other firms prior to
14 selecting Weintraub as its special litigation counsel. Weintraub is and has been counsel of record
15 for the RCASF in the pending joint coordinated proceeding in Alameda Superior Court (“JCP
16 5108”), where all complaints against northern California diocesan entities are being jointly
17 administered before Judge Evelio Grillo, including complaints filed against the RCASF.
18 Weintraub partners Paul Gaspari and Daniel Zamora were appointed as Institutional Defense
19 Liaison Counsel in the coordinated proceeding. The Tobin & Tobin firm, prior to merger with
20 Weintraub, has acted as counsel for the RCASF since approximately 1860.

21 5. Weintraub has defended the RCASF in clergy abuse litigation since at least 1988,
22 including in and around 2003, when the statute of limitations was first opened for a one-year
23 window (“Clergy III”). At that time, Weintraub defended the RCASF in approximately 100 cases,
24 which were resolved through trial and mediation. Through the years since 2003, Weintraub has
25 continued to defend the RCASF in clergy abuse litigation.

26 6. In addition to services defending the RCASF against abuse claims, Weintraub also
27 has represented the RCASF in various other, non-abuse matters, including several employment
28 related cases. Also, as part of the services the firm provides to the RCASF, from time to time,

1 Weintraub advises the RCASF on general legal matters.

2 7. As a result of its extensive history and prepetition representation of the RCASF and
3 its related entities, Weintraub has acquired in-depth knowledge of the Debtor's corporate, business
4 and litigation affairs, all of which will be involved in the Bankruptcy Case. As such, Weintraub
5 possesses the necessary background to address the Debtor's operational, corporate, state court
6 abuse claims litigation and related matters that may arise in the course of the Debtor's Bankruptcy
7 Case. Accordingly, the Debtor believes Weintraub is both well qualified and uniquely able to act
8 as its special corporate and abuse claims litigation counsel in this Bankruptcy Case in an efficient
9 and timely manner.

10 8. In the normal course of my role as General Counsel, I review and approve the
11 billings of outside counsel. Others at the RCASF may also assist or join in that review. If I have
12 issues with the reasonableness or necessity of any charges or services, I raise them with counsel,
13 discuss them and typically reach a reasonable resolution. The RCASF plans to use similar
14 procedures in this case.

15 9. I am informed and believe that Weintraub and the other professionals employed in
16 this case will monitor and coordinate with the other professionals to ensure a clear delineation of
17 each firm's respective roles to prevent unnecessary duplication of services and ensure the
18 Bankruptcy Case is administered in the most efficient fashion possible. Other than two primary
19 bankruptcy counsels to provide needed depth and experience, each other firm has a specific area
20 of expertise with clear delineations of areas of service. Rather than resulting in any extra or
21 unnecessary expense to the Debtor's estate, it is anticipated that the efficient coordination of efforts
22 of the Debtor's attorneys and other professionals will greatly add to the progress and effective
23 administration of the Bankruptcy Case.

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct. Executed on September 19, 2023, at San Francisco, California.

26 /s/ Paula F. Carney
27 PAULA F. CARNEY
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